

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

IN RE: ROCK 'N PLAY SLEEPER
MARKETING, SALES PRACTICES, AND
PRODUCTS LIABILITY LITIGATION

MDL No. 1:19-md-2903

Hon. Geoffrey W. Crawford

This Document Relates to: ALL CASES

**DECLARATION OF DEMET BASAR IN SUPPORT OF PLAINTIFFS' RESPONSE TO
DEFENDANTS' MOTION TO EXCLUDE THE DECLARATION AND OPINIONS OF
PLAINTIFFS' EXPERTS BRUCE SILVERMAN AND DR. J. MICHAEL DENNIS**

DEMET BASAR, ESQ., states under the penalty of perjury that the following is true and correct:

1. I am an attorney admitted to practice in the State of New York and of counsel at the law firm Beasley, Allen, Crow, Methvin, Portis & Miles, P.C., lead counsel for Plaintiffs in this matter. As such, I am familiar with the facts and circumstances stated herein.

2. I make this declaration in support of the Plaintiffs' Memorandum of Law in Opposition to Defendants' Motion to Exclude the Declaration and Opinions of Plaintiffs' Experts Bruce Silverman and Dr. J. Michael Dennis.

3. Attached hereto as Exhibit A are true and correct excerpts from the transcript of the deposition of Dr. J. Michael Dennis ("Dennis Tr.").

4. Attached hereto as Exhibit B are true and correct excerpts from the transcript of the deposition of Mr. Bruce Silverman ("Silverman Tr.").

Dated: New York, New York
January 13, 2022

/s/ Demet Basar
Demet Basar